

Privacy Policy

Veloce Luxury Car Rental

Adagio Moonshot (Pty) Ltd, trading as Veloce, operating as The Veloce Platform • Registration No. 2025 / 828845 / 07
Effective Date: 1 January 2023 • Last updated: June 2026

1. Introduction

Adagio Moonshot (Pty) Ltd, trading as Veloce and operating as The Veloce Platform ("Veloce", "we", "our", or "us"), is committed to protecting the privacy and security of your personal information. This Privacy Policy explains how we collect, use, disclose, store and protect your personal information in accordance with the Protection of Personal Information Act 4 of 2013 ("POPIA") of South Africa.

This Policy applies to all personal information we process in the course of providing our luxury vehicle rental services, including self-drive rentals, chauffeur-driven services and event packages, whether collected through our website, mobile application, messaging channels, or in person.

2. Information Officer

In accordance with POPIA, Veloce has appointed an Information Officer who is responsible for ensuring our compliance with the Act and for addressing any queries or requests relating to your personal information.

Information Officer: Matthias Trebbin
Email: info@veloceluxurycarrental.co.za
Telephone: 066 213 1503
Address: Cape Quarter, Shop 103C, 27 Somerset Rd, Green Point, Cape Town, 8005

Registration of the Information Officer with the Information Regulator of South Africa is currently pending approval.

3. Information We Collect

We collect and process personal information necessary to provide our car rental services. The types of personal information we may collect include:

- 3.1. **Personal identification information:** your name, contact details, identity or passport number, driver's licence details, date of birth, and payment information.
- 3.2. **Biometric and verification information:** facial images and related biometric data, and copies of identity and licence documents, collected for the purpose of verifying your identity and preventing fraud. This is treated as special personal information (see section 5).
- 3.3. **Reservation information:** details of your rental bookings, including pickup and drop-off locations, rental dates, and vehicle preferences.
- 3.4. **Communication information:** records of our interactions with you, including emails, calls, messaging conversations and customer service enquiries.
- 3.5. **Location information:** information about a rented vehicle's location and operation where vehicles are fitted with a vehicle management or tracking system, and device location where you use location-based features of our application.
- 3.6. **Usage information:** information about how you use our website, mobile application and services.

4. Lawful Basis and How We Use Your Information

We process your personal information on one or more of the following lawful bases under POPIA: the performance of a contract with you; compliance with a legal obligation; the protection of our legitimate interests or those of a third party; and, where required, your consent.

We use your personal information to:

- 4.1. Process, manage and fulfil vehicle rental reservations and related agreements.
- 4.2. Verify your identity and assess rental risk, including conducting biometric, identity, credit and criminal-record checks where applicable.
- 4.3. Process payments, deposits and refunds.
- 4.4. Communicate with you regarding your bookings, updates and, where you have consented, promotions.
- 4.5. Provide customer support and respond to enquiries.
- 4.6. Administer traffic fines, damages, recoveries and related matters arising from a rental.
- 4.7. Improve our services, website and application.
- 4.8. Comply with legal and regulatory requirements.

5. Special Personal Information (Biometric Data)

As part of our identity verification and fraud-prevention process, we collect and process biometric information, which POPIA classifies as special personal information. We process this information for the purpose of confirming that the person renting a vehicle is who they claim to be, protecting our vehicles and owners against fraud, and meeting our risk-management obligations.

This processing is carried out with your consent, given at the point of verification, and / or because it is necessary for the establishment, exercise or defence of a right or obligation in law. Biometric verification is performed through specialised third-party providers (see section 6).

6. Disclosure of Information and Third-Party Processors

We may share your personal information with the following categories of recipients, who process it on our behalf or as required:

- 6.1. **Payment processor – Paystack:** we use Paystack to process online payments, deposits and refunds. Your payment information is collected and processed by Paystack within their secure, PCI-DSS-compliant environment. Veloce does not store full card details on its own systems.
- 6.2. **Identity and biometric verification – Smile Identity (Smile ID):** we use Smile ID to perform biometric identity verification, including facial matching against submitted identity documents.
- 6.3. **Document and background verification – Experian:** we use Experian to verify identity documents and to conduct credit and related background checks where applicable.
- 6.4. **Vehicle owners and operational partners:** limited information necessary to fulfil and manage a rental may be shared with the relevant participating vehicle owner or operational partner.
- 6.5. **Credit bureaux and authorities:** where you have authorised it or where required by law, we may disclose information to credit bureaux, the South African Police Service and other relevant authorities, including to record any default.
- 6.6. **Legal and regulatory recipients:** we may disclose your information to comply with applicable laws, regulations or legal processes, or to establish, exercise or defend a legal right.

We require all third-party processors to safeguard your personal information and to process it only in accordance with our instructions and applicable law.

7. Cross-Border Transfer of Information

Some of our third-party service providers, including our payment processor, may process or store personal information on servers located outside South Africa. Paystack is a Stripe company, and personal information processed for payments may be transferred to and processed in other jurisdictions.

Where personal information is transferred outside South Africa, we take reasonable steps to ensure that it is afforded a level of protection consistent with POPIA, including through contractual safeguards with the relevant recipients, in accordance with section 72 of the Act.

8. Retention of Information

We retain personal information only for as long as necessary to fulfil the purposes for which it was collected, including to satisfy any legal, accounting, tax or reporting requirements, and to establish, exercise or defend legal claims. Verification and rental records are generally retained for the period required by applicable law following the conclusion of a rental, after which they are securely deleted or de-identified.

9. Security

We take reasonable and appropriate technical and organisational measures to protect your personal information against loss, unauthorised access, disclosure, alteration and destruction. While we strive to protect your information, no method of transmission or storage is completely secure, and we cannot guarantee absolute security.

10. Your Rights

Subject to POPIA, you have the right to:

- 10.1. Access the personal information we hold about you;
- 10.2. Request correction of any inaccurate or incomplete personal information;
- 10.3. Object, on reasonable grounds, to the processing of your personal information;
- 10.4. Request the deletion or destruction of your personal information, subject to our legal retention obligations;
- 10.5. Withdraw your consent where processing is based on consent, without affecting the lawfulness of processing carried out before withdrawal.

To exercise any of these rights, please contact our Information Officer using the details in section 2.

11. Complaints

If you are not satisfied with how we have handled your personal information, you have the right to lodge a complaint with the Information Regulator of South Africa:

The Information Regulator (South Africa)

Email: complaints.IR@inforegulator.org.za

Website: <https://inforegulator.org.za>

12. Changes to the Privacy Policy

We may update this Privacy Policy to reflect changes in our practices or for other operational, legal or regulatory reasons. Any changes will be posted on our website, and we encourage you to review this Policy periodically.

13. Contact Us

If you have any questions or concerns about this Privacy Policy or the handling of your personal information, please contact us at:

Veloce Luxury Car Rental

Cape Quarter, Shop 103C, 27 Somerset Rd, Green Point, Cape Town, 8005

info@veloceluxurycarrental.co.za

066 213 1503

By using our website, mobile application and services, you consent to the processing of your personal information as described in this Privacy Policy.

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